

DAVIS WRIGHT TREMAINE LLP
 KELLI L. SAGER (State Bar No. 120162)
 ALONZO WICKERS IV (State Bar No. 169454)
 KAREN A. HENRY (State Bar No. 229707)
 865 S. Figueroa Street, Suite 2400
 Los Angeles, California 90017-2566
 Telephone: (213) 633-6800
 Facsimile: (213) 633-6899

Attorneys for Non-Party Press Organizations
 PEOPLE MAGAZINE and NBC SUBSIDIARY (KNBC-TV), INC., on behalf of *Access Hollywood*

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 LOS ANGELES SUPERIOR COURT

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES

IN RE: MARRIAGE OF SPEARS AND
 FEDERLINE

Case No. BD 455662

**NON-PARTY PRESS ORGANIZATIONS'
 RESPONSE TO PETITIONER'S REPLY
 BRIEF; DECLARATION OF KAREN A.
 HENRY WITH EXHIBITS 1-3**

Date: September 14, 2007
 Time: 8:30 a.m.

Assigned to Commissioner Scott M. Gordon
 Dept. 88

[Press Organizations' Evidentiary Objections
 Filed Concurrently]

Pursuant to this Court's August 14, 2007 Order, non-party press organizations People Magazine and KNBC Subsidiary (KNBC-TV), Inc., on behalf of *Access Hollywood* (collectively "the Press Organizations") respectfully submit the following Response to petitioner Britney Spears' Reply Brief in support of her Application to Seal the Second Further Judgment on Reserved Issues.¹

¹ Respondent Kevin Federline has joined in Ms. Spears' Application to seal the Second Further Judgment.

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1. INTRODUCTION

In her Reply, Ms. Spears contradicts her Opening Brief, mischaracterizes the issues before this Court, and misstates the law. These defects underscore that she cannot meet the rigorous constitutional requirements for sealing the entire Second Further Judgment on Reserved Issues ("the Judgment") in this dissolution proceeding. For that reason, the Press Organizations respectfully request that the Court deny Ms. Spears' Application. As the Press Organizations proposed in their Opposition, the Court instead should redact from the publicly filed version of the Judgment only legitimately private information, such as Social Security numbers, confidential medical information, bank-account and brokerage-account numbers, residential addresses, telephone numbers, and Ms. Spears' sons' caretakers' contact information.

2. *NBC SUBSIDIARY* AND *BURKLE* GOVERN MS. SPEARS' APPLICATION TO SEAL THE JUDGMENT.

Ms. Spears spends much of her Reply insisting that *NBC Subsidiary (KNBC-TV), Inc. v. Superior Court*, 20 Cal. 4th 1178 (1999), and *Burkle v. Burkle*, 135 Cal. App. 4th 1045 (2006), do not apply in this matter. Her arguments are without merit.

Importantly, Ms. Spears acknowledged in her Opening Brief that the constitutional sealing standards reaffirmed by the California Supreme Court in *NBC Subsidiary* govern her Application. Opening Brief at 2:9-25. To justify her sudden about-face, Ms. Spears now contends that those standards do not apply because several statutes exempt certain carefully delineated categories of court proceedings and records involving juveniles from the public's presumptive right of access. Reply at 2:14-5:14. For example, she cites Welfare & Institutions Code § 827, which governs juvenile-dependency proceedings, Family Code § 7643, which governs paternity proceedings, Family Code § 8611, which governs adoption proceedings, Family Code § 1818, which governs conciliation-court proceedings, and Family Code §§ 3025.5 and 3111, which govern Court-ordered psychological evaluations of children. *Id.* Yet, none of these statutes even remotely supports Ms. Spears' argument that the Judgment must be sealed merely because it relates – as many such judgments in divorce proceedings inevitably do – to child custody or child support. To the contrary, these statutes support the Press Organizations' position by demonstrating that when the

1 Legislature wishes to shield certain categories of court proceedings or court records from public
2 scrutiny, it does so explicitly. *See Burkle*, 135 Cal. App. 4th at 1061. In the absence of any such
3 express legislative direction, records from divorce proceedings remain presumptively open to the
4 public. *Id.* at 1058 n.17.

5 Ms. Spears is not the first litigant in a divorce proceeding to argue that the statutes cited in
6 her Reply override the public's right of access to divorce proceedings and related records. In fact,
7 billionaire supermarket magnate Ronald Burkle, who also was represented by Ms. Spears' counsel,
8 advanced the same argument in his divorce proceedings. As the Court of Appeal explained, Mr.
9 Burkle attempted to justify keeping various divorce-court records secret by "point[ing] to other
10 provisions of the Family Code" – *including the same Family Code statutes that Ms. Spears cites in*
11 *her Reply* – "that provide for the closure of proceedings or the sealing of documents[.]" *Id.* But the
12 court rejected Mr. Burkle's argument, noting that those provisions "are merely examples of the
13 'particular proceedings' to which *NBC Subsidiary* referred when it stated [in footnote 30] that its
14 opinion addressed 'the right of access to ordinary civil proceedings in general, and not any right of
15 access to particular proceedings governed by specific statutes.'" *Id.* Refusing Mr. Burkle's
16 invitation to expand these narrowly circumscribed confidentiality statutes, the Second District
17 concluded that "[t]hese specific statutes governing particular proceedings *do not tell us anything*
18 *about ordinary divorce proceedings.*" *Burkle*, 135 Cal. App. 4th at 1058 n.17 (emphasis added).
19 Thus, the statutes cited by Ms. Spears plainly do not exempt the Judgment from the public's right
20 of access.

21 Ms. Spears' attempt to distinguish *Burkle* also is unpersuasive. Ironically, after falsely
22 accusing the Press Organizations of "totally mischaracteriz[ing] both the issues before the Court
23 and the holding" in *Burkle*, Ms. Spears bluntly proclaims that "[t]he *only* issue before the Court of
24 Appeal [in that case] was the constitutionality of Family Code § 2024.6." Reply at 6:27-7:1
25 (emphasis added). In fact, the *Burkle* court expressly declared that the case presented *two* issues:
26 "*whether the presumption of openness applicable to substantive courtroom proceedings in ordinary*
27 *civil cases likewise applies to court records in divorce proceedings*, and, if so, whether section.
28 2024.6 is a constitutionally permissible restriction on the right of access under the standards

1 announced in *NBC Subsidiary*.” 135 Cal. App. 4th at 1052 (emphasis added). Thus, the threshold
2 question in *Burkle* was whether the public’s right of access applies to court records in divorce
3 proceedings, such as the Judgment. Not surprisingly, Ms. Spears neglects to mention the Second
4 District’s unambiguous conclusion that “the same First Amendment right of access applicable in
5 ordinary civil cases applies in divorce proceedings[,]” and that “*court records in divorce cases, as*
6 *in other civil cases, are presumptively open.*” *Id.* at 1052, 1061 (emphasis added).²

7 In an attempt to escape the *Burkle* court’s unequivocal holding, Ms. Spears resorts to artful
8 wordplay. Because the Second District specifically recognized the public’s right of access to
9 “divorce proceedings” and to “court records in divorce cases,” Ms. Spears conspicuously avoids
10 using those phrases in her Reply. Instead, she repeatedly refers to this proceeding as a “custody
11 proceeding” and to the Judgment as a “custody-related matter.” *See, e.g.,* Reply at 2:14-3:23, 4:15-
12 5:14, 8:1-8:22. But Ms. Spears’ implied distinction between “divorce proceedings” and “custody
13 proceedings” is illusory. Many divorce proceedings necessarily involve child-custody and child-
14 support issues, and nothing in *Burkle* or any other California authority supports Ms. Spears’
15 apparent belief that the right of access does not extend to divorce-court records that address child
16 custody or child support. As the *Burkle* court emphasized, “*no California case holds or even hints*
17 *that the ... generally open nature of court files ... var[ies] when family law litigation is involved.*”
18 135 Cal. App. 4th at 1056 (emphasis added), *citing In re Marriage of Lechowick*, 65 Cal. App. 4th
19 1406, 1413-1414 (1998).³

20
21 ² Ms. Spears mistakenly relies on *Whitney v. Whitney*, 164 Cal. App. 2d 577, 582 (1958), for
22 the proposition that the presumption of openness does not apply to divorce proceedings. While Ms.
23 Spears is correct that the appellate court in *Whitney* upheld the trial court’s decision to exclude the
24 public from that divorce proceeding “for the good of the child,” she overlooks the fact that *Whitney*
predates *NBC Subsidiary* by more than 40 years and *Burkle* by nearly 50 years, and thus has
limited, if any, precedential value. Moreover, as the Court of Appeal noted in *Green v. Uccelli*, 207
Cal. App. 3d 1112, 1119-1120 (1989), *Whitney* “did not discuss sealing a [court] file.”

25 ³ Ms. Spears’ effort to distinguish *Marriage of Lechowick* likewise fails. As the Press
26 Organizations pointed out in their Opposition, the *Lechowick* court broadly held that “court files in
27 family law cases should be treated no differently than the court files in any other cases for purposes
28 of considering the appropriateness of granting a motion to seal any of those files.” *Opp.* at 5:24-28,
quoting 65 Cal. App. 4th at 1413. Nothing in *Lechowick* suggests that documents relating to child
custody or child support are exempt from this general presumption of access to “court files in
family law cases.” And the Second District has commented that the California Supreme Court in
NBC Subsidiary expressed “not the faintest hint of disagreement with *Lechowick*’s conclusion that

1 Finally, Ms. Spears argues that *Burkle* does not apply to the Judgment because the parties
2 might have been afforded greater confidentiality if they had resolved their disputes in conciliation
3 court or in mediation. Reply at 3:18-21. According to Ms. Spears, “[i]t would turn logic on its
4 head to conclude that ... if the parties had reached their custody agreement either in conciliation
5 court or mediation, its terms would be confidential, [but] because they resolved that same issue in
6 another fashion then those terms automatically should be available to the [public].” *Id.* In fact, the
7 case law mandates precisely that result, and for good reason. In *Green*, 207 Cal. App. 3d at 1119-
8 1120, for example, the court declared that “[t]he contents of the file of a divorce proceeding are
9 ‘historically and presumptively’ a matter of public record,” and that a litigant thus “should have
10 realized that when he filed his action for dissolution in superior court he was entering a public
11 forum which would result in public disclosure of private facts.” Similarly, in *Estate of Hearst*, 67
12 Cal. App. 3d 777, 784 (1977), the Second District recognized that when parties resort to the
13 public’s court to handle their family affairs, “in a sense they take the good with the bad, knowing
14 that with public protection comes public knowledge of activities [and] assets.” If Ms. Spears
15 desired the confidentiality that may attach to conciliation-court proceedings or to mediation, she
16 should have resolved her dispute with Mr. Federline in one of those venues. When she initiated her
17 dissolution proceeding in this Court, however, she accepted “the possibly disadvantageous
18 circumstance that the documents and records filed in [the case] will be open to public inspection.”
19 *Id.* at 783.

20 Under *Burkle*, Ms. Spears cannot now claim that the Judgment is exempt from the
21 presumption of openness that applies to divorce proceedings and records in California. Thus, no
22 portion of the Judgment may be sealed unless and until she satisfies the rigorous test set forth in
23 *NBC Subsidiary* and California Rules of Court 2.550 and 2.551.

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27 divorce proceedings and records in California are presumptively open.” *Burkle*, 135 Cal. App. 4th
28 at 1062 n.23.

1 **3. MS. SPEARS HAS NOT – AND CANNOT – MEET THE CONSTITUTIONAL**
2 **STANDARD FOR SEALING THE JUDGMENT.**

3 Despite Ms. Spears' efforts to obscure the *Burkle* holding, the Second District left no doubt
4 in that case that the test set forth in *NBC Subsidiary* (and in Rule 2.550(d)) determines whether
5 court records in divorce proceedings may be sealed or redacted. *Burkle*, 135 Cal. App. 4th at 1062.
6 Consequently, the Judgment must be made a part of the public court file unless this Court
7 "expressly finds facts that establish: (1) There exists an overriding interest that overcomes the right
8 of public access to the record; (2) The overriding interest supports sealing the record; (3) A
9 substantial probability exists that the overriding interest will be prejudiced if the record is not
10 sealed; (4) The proposed sealing is narrowly tailored; and (5) No less restrictive means exist to
11 achieve the overriding interest." Cal. R. Ct. 2.550(d). As set forth in the Opposition and below,
12 Ms. Spears cannot meet these requirements.

13 In her Reply, Ms. Spears does not dispute that the parties' agreement to seal the Judgment
14 does not affect her heavy burden under the First Amendment and Rule 2.550. *See, e.g.*, Cal. R. Ct.
15 2.551(a) ("a court must not permit a record to be filed under seal based solely on the agreement or
16 stipulation of the parties"); *H.B. Fuller Co. v. Doe*, 151 Cal. App. 4th 879, 891-892 (2007) (same);
17 *In re Providian Credit Card Cases*, 96 Cal. App. 4th 292, 296, 309-310 (2002) (same). Nor does
18 she dispute that her celebrity does not insulate her from the public's First Amendment right of
19 access. *See, e.g., ABC, Inc. v Stewart*, 360 F.3d 90, 106 (2d Cir. 2004) ("[t]he mere fact of intense
20 media scrutiny of a celebrity defendant, without further compelling justification, is simply not
21 enough to justify closure" of a court proceeding). Ms. Spears also apparently has abandoned her
22 argument that her own interest in financial privacy trumps the public's right of access, now
23 insisting that "it is *not* the protection of Petitioner which is the subject of this joint application, but
24 the protection of two young children[.]" Reply at 1:26-27 (emphasis added).⁴

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27 ⁴ In any event, Ms. Spears' financial-privacy argument did not justify sealing, as the Press
28 Organizations explained in their Opposition. Opp. at 8:14-27.

1 Under these circumstances, the only remaining interest to balance against the public's right
2 of access is "promoting [Ms. Spears' sons'] health, safety and welfare." *Id.* at 9:26-28. To be
3 clear, the Press Organizations agree that the security or privacy of minor children may constitute a
4 compelling interest that, upon a proper showing, may justify redacting information from court
5 records in divorce proceedings. In this case, however, Ms. Spears has not come close to
6 establishing that sealing the entire Judgment is necessary to protect those interests.

7 **A. Ms. Spears Has Not Established That An Overriding Interest Supports Her**
8 **Application To Seal The Entire Judgment, Or That A Substantial Probability Exists**
9 **That Any Such Interest Would Be Prejudiced Absent Sealing.**

10 In an attempt to substantiate the alleged risk of harm to her sons, Ms. Spears offers her
11 counsel's testimony that the entertainer "has legitimately felt that the minor children's security and
12 safety, as well public safety, have been threatened by the practices of the paparazzi, as well as by
13 the dissemination of confidential information relating to the minor children's care and custody."
14 Wasser Decl. at ¶ 4. As set forth in the Press Organizations' concurrently filed Evidentiary
15 Objections, however, such testimony about Ms. Spears' feelings lacks foundation and is
16 inadmissible hearsay. Nor can Ms. Spears justify sealing the entire Judgment based on her
17 counsel's testimony that "[t]he information in the Second Further Judgment on Reserved Issues
18 relating to the minor children's specific timeshare schedule, transportation and other matters ...
19 greatly increases the chances that the actions of the media could threaten the safety of the minor
20 children by, for example, causing a traffic accident or by exposing the minor children to criminals
21 who might target the minor children for financial gain." Wasser Decl. at ¶ 6. In particular, Ms.
22 Wasser does not describe how the release of any specific information would magnify these asserted
23 risks.

24 *Estate of Hearst* is instructive, and illustrates the heavy burden that Ms. Spears must meet to
25 overcome the public's right of access. There, the trustee of William Randolph Hearst's estate
26 sought to seal probate files, arguing that, absent sealing, "members of the Hearst family, including
27 minors and family members who have changed their surname by marriage, would be in grave
28 danger of their lives and property[.]" 67 Cal. App. 3d at 781. To establish that these beneficiaries

1 were in imminent danger, the trustee “filed newspaper clippings reporting numerous bombings,
2 threats to the lives of family members, and events related to the notorious kidnapping of Patricia
3 Hearst.” *Id.* The Second District explained that portions of the probate-court records might
4 properly be redacted, but only after a sufficient evidentiary showing. Specifically, while
5 acknowledging that the evidence presented by the trustee “suggested that the Hearst family had
6 become a target for various lawless radical organizations[.]” the court explained that sealing could
7 only be justified upon a showing “that beneficiaries of the Hearst trusts would be placed in serious
8 danger of loss of life or property *as a consequence of general public access to the Hearst probate*
9 *files,*” not simply as a consequence of the family’s prominence, and that the trustee would have to
10 demonstrate that the beneficiaries continued to face “a clear and present danger of attack.” *Id.* at
11 784, 786 (emphasis added).

12 Ms. Spears has not presented evidence sufficient to satisfy this high standard. Her concerns
13 about her sons’ privacy and security plainly are sincere, but those concerns reflect her status as a
14 pop star and the very public way in which she has chosen to conduct her affairs. She has cultivated
15 celebrity, and has undertaken projects like her reality television show *Chaotic*, which featured
16 highly personal moments that Ms. Spears captured on her personal camcorder for later broadcast on
17 the former UPN network and sale on DVD. Henry Decl. at ¶ 2 and Ex. 1. She also has made
18 photos of her sons available for publication, including in *People*. *Id.* at ¶ 3 and Ex. 2. Because her
19 career and her lifestyle ensure that she and her children will continue be the subject of substantial
20 public attention (*id.* at ¶ 4 and Ex. 3), it is wholly speculative, at best, to assert that sealing the
21 Judgment will in any way reduce that level of attention. For that reason, Ms. Spears cannot meet
22 her burden of showing “a substantial probability exists that [her sons’ privacy or security interests]
23 will be prejudiced” absent secrecy.

24 **B. Ms. Spears Also Cannot Show That Sealing The Entire Judgment Is A Narrowly**
25 **Tailored Limitation On Public Access, Or That No Less Restrictive Alternatives Exist.**

26 Ms. Spears mistakenly asserts that the proposed sealing of the entire Judgment “could not
27 be more narrowly tailored” because “[t]he parties deliberately prepared a separate document, ...
28 which deals solely with child custody and support.” Reply at 10:3-5. It is well established that a

1 sealing order is “narrowly tailored” only if shields from public view solely that information
2 necessary to protect the purported overriding interest. *Burkle*, 135 Cal. App. 4th at 1066. Here, her
3 sons’ security is the only interest asserted by Ms. Spears to balance against the public’s right of
4 access. Reply at 1:27-2:3. As a result, Ms. Spears’ proposed sealing is “narrowly tailored” only if
5 it keeps secret exclusively that information that, if disclosed, would expose her sons to a risk of
6 harm. But Ms. Spears’ sealing request extends much more broadly; indeed, it would shield every
7 word of every sentence of every paragraph of the Judgment, regardless of whether disclosure of the
8 information would expose her sons to harm. As a result, her proposed sealing of the entire
9 Judgment is not “narrowly tailored.”

10 Ms. Spears also cannot demonstrate that a less restrictive alternative – specifically,
11 redacting limited information from the document and placing the redacted version in the public file
12 – would not adequately protect her sons’ interests. Again, *Burkle* is on point. There, the Second
13 District faulted Mr. Burkle for “suggest[ing] no reason why redaction [wa]s not a reasonable
14 alternative” to sealing more than two dozen pleadings in their entirety. 135 Cal. App. 4th at 1067.
15 As Ms. Spears acknowledges, the trial court in *Burkle* court issued a narrow order – which was not
16 disturbed on appeal – redacting certain information from those pleadings “to protect the [Burkles’]
17 son from possible harm.” 135 Cal. App. 4th at 1049. *See also* Reply at 7:12-19. To further that
18 interest, the court redacted “residence addresses,” “names and account numbers for bank and
19 brokerage accounts,” and similar information. *Burkle*, 135 Cal. App. 4th at 1049. *See also* Ex. A
20 to Brouman Decl. Such an order redacting such limited categories of information is exactly the
21 sort of less restrictive alternative that the Press Organizations consistently have proposed to balance
22 the competing interests in this case. Opp. at 2:5-7, 10:1-4.⁵

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25 ⁵ Curiously, although the Press Organizations expressly and repeatedly have stated that they
26 would not oppose the redaction of Ms. Spears’ sons’ “Social Security numbers, confidential
27 medical information, bank and brokerage-account numbers, and caretakers’ names and addresses”
28 (Opp. at 2:5-7, 10:1-4), Ms. Spears claims in her Reply that the Press Organizations have “fail[ed]
to even identify what less restrictive alternative they believe would achieve the overriding interest
of preserving [her sons’] health, safety and welfare.” Reply at 10:11-14.

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4. CONCLUSION

Ms. Spears has not carried her burden under *NBC Subsidiary, Burkle*, or Rule of Court 2.550(d). She has not established that an overriding interest supports her sealing application, or that a substantial probability exists that any such interest would be prejudiced absent sealing. Nor has she shown that her demand that the Court seal the entire Judgment is narrowly tailored, or that there are no less restrictive means of balancing her sons' interests and the public's constitutional right of access.

Accordingly, the Press Organizations respectfully request that the Court deny Ms. Spears' application, and instead redact from the publicly filed version of the Judgment only such legitimately private information as Social Security numbers, confidential medical information, bank-account and brokerage-account numbers, residential addresses, and her sons' caretakers' contact information.

DATED: September 7, 2007

By: Alonzo Wickers IV
Alonzo Wickers IV

DECLARATION OF KAREN A. HENRY

I, Karen A. Henry, declare:

1. I am an attorney admitted to practice before all the courts of the State of California and before this Court. I am an associate in the law firm of Davis Wright Tremaine LLP, and am one of the attorneys representing non-party press organizations People Magazine and KNBC Subsidiary (KNBC-TV), Inc., on behalf of *Access Hollywood* (collectively "the Press Organizations"). The matters stated below are true of my own personal knowledge, and, if called to testify, I could and would competently testify to such matters.

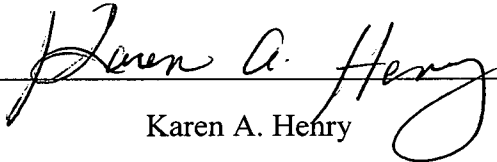
2. On September 7, 2007, I accessed the website of People Magazine, and printed the page appearing at the address: <http://www.people.com/people/article/0,26334,1062734,00.html>. This page contains an article entitled "Britney & Kevin's Chaotic Debut." I also accessed VH1's website, and printed the page appearing at the address: http://www.vh1.com/shows/dyn/britney_kevin_chaotic/series_about.jhtml. This page contains and article entitled "Britney & Kevin: Chaotic." Both of the articles described above, which are attached to this Declaration collectively as Exhibit A, discuss the six-episode reality series starring Britney Spears and Kevin Federline, which now is available on DVD.

3. On September 7, 2007, I accessed MTV's website, and printed the page appearing at the address: http://www.mtv.com/news/articles/1514457/20051123/spears_britney.jhtml. This page contains an article entitled "Britney Baby Photos to Appear in *People*," a true and correct copy of which is attached to this Declaration as Exhibit B.

4. On September 7, 2007, I accessed Google's search engine and conducted a search for "Sean Preston" and "Britney Spears." I printed the page appearing at the following address: <http://www.google.com/search?hl=en&q=%22Sean+Preston%22+%22Britney+Spears%22&btnG=Google+Search>. This page contains the results of that search, and reflects about 667,000 results. I also conducted a search for "Britney Spears," and printed the page appearing at the following address: <http://www.google.com/search?hl=en&q=%22Britney+Spears%22&btnG=Search>. This page contains the results of that search, and reflects about 44,400,000 results for this search. True

1 and correct copies of the pages listed in this paragraph are attached to this Declaration collectively
2 as Exhibit C.

3 This Declaration was executed on this 7th day of September, 2007, at Los Angeles,
4 California. I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

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7 Karen A. Henry

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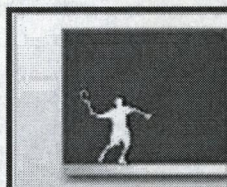
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Britney & Kevin's Chaotic Debut

WEDNESDAY MAY 18, 2005 08:15 AM EDT

By Michael Fleeman and Stephen M. Silverman



Kevin Federline and Britney Spears

PHOTO BY: UPN



Britney and Kevin: Chaotic, a six-episode reality series starring Britney Spears and husband Kevin Federline, held its much-ballyhooed premiere on UPN Tuesday night, allowing the world to look into their private world.

More on this story

Britney & Kevin: The Breakup

As for what was witnessed: extreme close-ups exposing Britney's pores, lots of kissing and eerie green night-vision camerawork. Opening with Britney on tour (in London), the pop princess is shown on an emotional quest.

"I don't believe in marriage," she says right into the camera. "I've been married. But that's a different story." Seeking relationship advice from nearly everyone she meets, Britney is looking for a guy who is "cool" and "hasn't really seen that much," because, she says, she has seen so much already.

During her quest, Britney hits the stage of a huge stadium filled with screaming fans ("They're all here for me") and travels in her RV ("You feel like you're in a midget home"). She asks tourmate JC Chasez what his favorite sex positions are but doesn't receive much of an answer ("He's shy").

Halfway into the first episode, Britney, who met Kevin at the L.A. club Joseph's, decides to fly him to London to be with her. Kevin's relationship with Shar Jackson,



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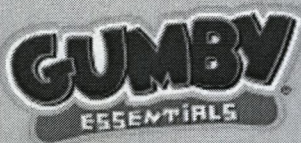
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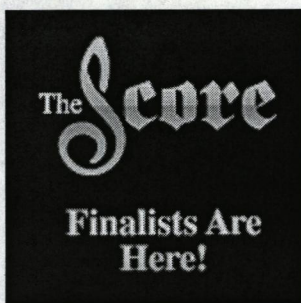
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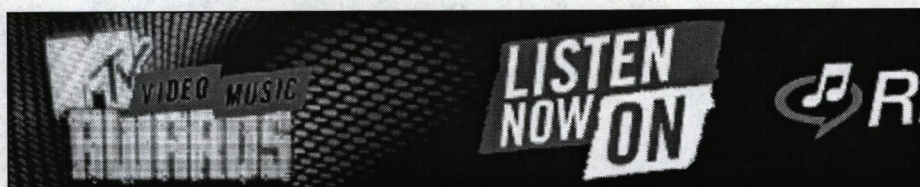
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Magazine denies earlier, leaked photos originated from its shoot.

By Jennifer Vineyard

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Just two months after Britney Spears gave birth — and one month after photos of her baby leaked onto the Internet — the pop star is posing with her new family for the cover of this week's *People* magazine.

The move comes just in time to promote her new album, *B in the Mix: The Remixes*, which hit stores this week (see "[Surprise: Britney's Releasing An Album In Just Two Weeks](#)").

The *People* story, on stands Friday, details the Federline family's plans to celebrate Thanksgiving, from watching the Macy's Thanksgiving parade on television to spending the afternoon hanging out and eating such Southern-style dishes as cornbread dressing, giblet gravy, sweet potato crunch, broccoli casserole, pecan pie and bread pudding. After the feast, they plan to get guests to help out with Christmas decorations around the house. "I already started putting up a few of the decorations myself because I couldn't wait!" the singer told the mag.

Spears' other family-oriented move was to set up the Spears Family Hurricane Relief Foundation to aid victims of Hurricane Katrina. "It will assist in the rebuilding of homes, removal of trees and debris, fixing roofs, support after-school programs, and provide clothing," she told *People*. The Britney Spears Foundation has already given grants to Habitat for Humanity and to the East Baton Rouge Parish School System to place up to 7,000 New Orleans students in their schools.

However, Spears' main plans now revolve around being a mother, with her most prized time with little Sean Preston being their afternoon naps together (see "[Britney And Kevin \(Finally\) Pick A Name For Their Baby, Mag Reports](#)").

Spears' camp was outraged over the leaked photos of Britney and her baby, issuing a statement that called them "stolen." A representative for *People* magazine — whose shoot was allegedly the source of the leaked photos — said at the time that they never had any photos of the pop star and her baby; reports suggested Spears had posed for the shots but changed her mind about releasing



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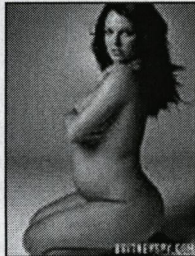
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